



January 21, 2019

John M. Robertson, Executive Officer
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Delivered via electronic mail to AgNOI@waterboards.ca.gov

Dear Executive Officer Robertson,

This letter is submitted on behalf of the Monterey County Vintners & Growers Association (MCVGA), the regional trade association for the local wine grape growing and winemaking industries. We support the positions contained herein and more deeply elaborated upon in the letter submitted by the Wine Institute (dated January 21, 2019).

First, we would like to acknowledge the efforts of the Central Coast Regional Water Quality Control Board to seek public input and more specifically to seek distinct input from the regional wine growing industry.

ABOUT MONTEREY COUNTY GRAPE GROWING

Monterey County cultivates approximately 46,000 acres of wine grapes in 325 distinct vineyards, representing almost 9% of the total cultivated acreage in California. The growers of Monterey County are very aware of both water quality and quantity and thus implement practices that protect and preserve both. (Over 65% of our vineyards participate in at least one sustainability certification program.)

SUMMARY OF RECOMMENDATIONS

Below is an overview of our suggestions. As mentioned above, this information is more deeply detailed in the letter from the Wine Institute.

VINEYARDS REPRESENT LOW RISK

As background, vineyards inherently present a low risk to water quality across many potential pollutants, and numerous widely-adopted management practices further lower

the risk of surface water and groundwater pollution from winegrowing activities. Also, we apply low amounts of nitrogen and other nutrients, using tests and targeted timing to apply fertilizers only when and where they are necessary. Tightly-controlled vineyard irrigation means very little to no applied water is discharged, helping to prevent the mobilization of nutrients and pesticides below the root zone or into surface waters. Cover crops, buffer strips, and other common vegetative and cultural controls help prevent, slow and capture soil erosion and nutrient losses during storm events.

PRINCIPLES TO INCLUDE IN AG ORDER 4.0

Because of these characteristics unique to vineyards - timelines, documentation, and monitoring and reporting under the Order should be at a level consistent with the lower risk presented by vineyard operations. We ask that you incorporate Wine Institute and Monterey County Vintners & Growers Association recommended principles into the Ag Order.

- Principles:
 - Require only the collection, analysis, and/or reporting of data that is directly necessary to ensuring beneficial uses in the watersheds are protected.
 - Maximize growers' ability to use existing documentation and information to satisfy monitoring, reporting, and/or management planning requirements.
 - Management plans created for compliance with the Order should remain on-farm.
 - Prioritize based on risk to water quality, specifically by considering ranch characteristics in evaluating risk, in addition to location characteristics as proposed in the staff framework.
 - Further, to build meaningful, long-lasting change, growers need incentives.
- The prioritization structure should consider multiple variables and implement requirements according to the risk an operation posed to water quality.
- Vineyards present a low risk of nitrate contamination and should be exempt from nitrogen reporting requirements.
- Continue to recognize sustainability certifications as an incentive.

Thank you again for the opportunity to offer input. Please do not hesitate to contact us if you have any questions.

Sincerely,

Kim Stemler
Executive Director
Monterey County Vintners & Growers Association
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